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*SCCY Industries, LLC and Joe Roebuck*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CHRISTOPHER D. ADAMS,

Plaintiff(s),

-v-

SCCY INDUSTRIES, LLC, d/b/a  
SCCY FIREARMS, JOE ROEBUCK, ABC  
COMPANIES (1-10) (fictitious names of  
unknown entities), and JOHN DOES (1-10)  
(fictitious names of unknown persons),

Defendant(s).

**Civil Action No.:**

**DECLARATION OF LAWRENCE J.  
DEL ROSSI, ESQ. IN SUPPORT OF  
DEFENDANTS' MOTION TO SEAL  
AND TO STRIKE PORTIONS OF THE  
COMPLAINT**

I, Lawrence J. Del Rossi, declare as follows:

1. I am partner at the law firm of Faegre Drinker Biddle & Reath LLP, which represents Defendants SCCY Industries, LLC ("SCCY") and Joe Roebuck (collectively "Defendants") in the above-captioned matter. I submit this Declaration and Exhibits based on my personal knowledge and in support of Defendants' Motion to Seal and Strike Portions of the Complaint.

2. This case involves an employment dispute between Plaintiff Christopher D. Adams, Esquire, who alleges in his Complaint that he was first retained as outside counsel to SCCY and ultimately served as SCCY's President and General Counsel, and Defendants. Adams alleges that in his capacity as an attorney acting on behalf of SCCY, he regularly advised SCCY on legal issues

involving litigation and regulatory inquiries, among other responsibilities, prior to his termination on February 18, 2019.

3. Attached as **Exhibit A** is a true and complete copy of Plaintiff's counsel, Christopher J. Eibeler, Esq.'s letter, dated January 22, 2020, to Defendants' Florida counsel, John P. Ferguson, Esq. of Cobb Cole.

4. Attached as **Exhibit B** is a true and complete copy of Mr. Ferguson's letter, dated January 27, 2020, to Mr. Eibeler.

5. Attached as **Exhibit C** is a true and complete copy of Mr. Eibeler's letter, dated January 28, 2020, to Mr. Ferguson.

6. Attached as **Exhibit D** is a true and complete copy of Mr. Ferguson's letter, dated January 29, 2020, to Mr. Eibeler.

7. Attached as **Exhibit E** is a proposed redacted amended Complaint striking from the original Complaint privileged information. Also attached under seal is **Exhibit F**, a version of Exhibit E showing the text proposed to be stricken which has been provided to Plaintiff, and the Court, to facilitate *in camera* review of the proposed redactions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 23, 2020

/s/Lawrence J. Del Rossi  
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